

EXHIBIT 1

0001
1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF OHIO
2 WESTERN DIVISION

3 -----

4 American Pan Company, :
5 Plaintiff, :
6 vs. :
7 Case No. 3:06 CV 0197

Lockwood : Judge Thomas M. Rose
8 Manufacturing, Inc.,
9 Defendant.
10 :
11 -----

12 DEPOSITION OF JENNIFER M. BRYAN
13 -----
14

15 Taken at Bricker & Eckler LLP
16 100 South Third Street
Columbus, OH 43215
17 July 19, 2007, 1:25 p.m.

18 -----

19 Spectrum Reporting LLC
20 333 Stewart Avenue, Columbus, Ohio 43206
21 614-444-1000 or 800-635-9071
22 www.spectrumreporting.com
23 -----
24 -----

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1 APPEARANCES

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ON BEHALF OF PLAINTIFF:

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Bailey Cavalieri

4 10 West Broad Street, 21st Floor
Columbus, OH 43215

5 By W. Evan Price, II, Esq.
Robert R. Dunn, Esq.

6 R. Cliffton Gibbs, Esq.

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ON BEHALF OF DEFENDANT:

8

Mueller, Smith & Matto
9 7700 Rivers Edge Drive
Columbus, OH 43235-1355

10 By Edward A. Matto, Esq.

11 and

12 Bricker & Eckler LLP
100 South Third Street
13 Columbus, OH 43215
By James P. Schuck, Esq.

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1 Q. You would reference them for custom

2 jobs in your employment at Lockwood?

3 A. Yes, for pan specifications.

4 Q. Now, when you say specifications,

5 pricing or sizing or -- describe for me what you

6 mean by referencing.

7 A. These are custom products, so I

8 referenced them for the pan specifications for

9 measurements and features that went on the pans in

10 lieu of acquiring a sample from the customer.

11 Q. Did you ever use these documents for

12 leads with customers?

13 A. No.

14 Q. Since you joined Lockwood, have you

15 shared these documents with anyone other than

16 Mr. Murray?

17 A. No.

18 Q. You haven't shared them with anyone at

19 Lockwood or outside of Lockwood?

20 A. No. There may have been maybe one

21 drawing that I've sent to Mario. But, no, not the

22 extent of the files, no.

23 Q. You haven't shared these documents with

24 any third parties?

0059

1 State of Ohio : CERTIFICATE

2 County of Franklin: SS

3 I, Stacy M. Rowley, a Notary Public in and for
4 the State of Ohio, certify that Jennifer M. Bryan
5 was by me duly sworn to testify to the whole truth
6 in the cause aforesaid; testimony then given was
7 reduced to stenotype in the presence of said
8 witness, afterwards transcribed by me; the
9 foregoing is a true record of the testimony so
10 given; and this deposition was taken at the time
11 and place specified on the title page.

12 Pursuant to Rule 30(e) of the Fed. R. Civ. P.,
13 the witness and/or the parties have not waived
14 review of the deposition transcript.

15 I certify I am not a relative, employee,
16 attorney or counsel of any of the parties hereto,
17 and further I am not a relative or employee of any
18 attorney or counsel employed by the parties hereto,
19 or financially interested in the action.

20 IN WITNESS WHEREOF, I have hereunto set my hand
21 and affixed my seal of office at Columbus, Ohio, on
22 August ___, 2007.

23 _____

24 Stacy M. Rowley, Notary Public - State of Ohio